

1 Noel Grefenson
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7 Attorney for Josh Hall

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF OREGON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSH HALL,

14 Defendant.

Case No.: CR 10-229 BR

DECLARATION OF NOEL GREFENSON
IN SUPPORT OF MOTION TO CONTINUE
TRIAL

15 Under the penalty for perjury, I, Noel Grefenson, hereby certify that the following
16 facts are true and correct to the best of my knowledge and belief:

17 1. I am substitute counsel for defendant Josh Hall, who is charged in this case
18 with Bank Fraud and Making False Statements to a Bank in the District of Oregon. I was
19 appointed by this Court on March 11, 2011.

20 2. Mr. Hall is out of custody pending resolution of his charges and he remains
21 in regular contact with my office.

22 3. Trial in this case is set for February 28, 2012. The parties have agreed that
23 the government will dismiss its indictment and charge defendant with a misdemeanor

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1 offense. I expect that the government will file a Superseding Information in the near future
2 which provides details concerning the alleged misdemeanor offense.

3 4. I require additional time to review with the defendant materials which
4 concern the residential property subject to the new charge and anticipated plea, including
5 financial information for purposes of restitution, and to otherwise complete paperwork
6 pertinent to the resolution of this case. I believe 15 days will provide adequate time to
7 satisfy these objectives.

8 5. The co-defendant in this case, David J. VanBeenen, has pleaded guilty and
9 was sentenced to 1-day prison term and 3 years supervised probation.

10 6. I have discussed Mr. Hall's speedy trial rights with him on multiple
11 occasions. Mr. Hall is aware of his speedy trial rights and agrees that a postponement of
12 his scheduled trial date is reasonable and necessary for the reasons stated above.

13 7. Counsel for the Government, Michelle Kerin, agrees with and joins in the
14 requested continuance.

15 8. For the reasons stated above and considering that a postponement will
16 facilitate the fair and just resolution of this case, I maintain that under Title 18 U.S.C §
17 3161(h)(7)(A), (B) the ends of justice served by postponement of a trial herein outweigh
18 the interest of the public and the defendant in a speedy trial.
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20 Dated: February 23, 2012.

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22 */s/ Noel Grefenson*

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24 Noel Grefenson, OSB No. 88216
25 Attorney for Defendant Hall